

IN THE DISTRICT COURT OF CREEK COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
CREEK COUNTY SAPULPA OK

JUN 22 2012

TIME 9:15
Amanda VanOrsdol, COURT CLERK

JANE DOE,

Plaintiff,

v.

Case No:

CJ-2012- 269

DEFENDANT A,

DEFENDANT B,

DEFENDANT C, and

DEFENDANT D,

Defendants.

APPLICATION FOR PROTECTIVE ORDER AND INSTRUCTIONS

COMES NOW the Plaintiff and moves the Court to issue an Order pursuant to 12 O.S. §3226(C)(7) and 51 O.S. §24A.29 concerning the conduct of this case, protecting the confidentiality of the Plaintiff's identity and for other relief as requested below.

In support of this Motion, Plaintiff directs the Courts attention to "Plaintiff's Identification of the Parties and Other Persons" and "Plaintiff's Brief in Support of Plaintiff's Application for Protective Order," which are attached to the Court's copy of this Motion. Plaintiff requests that they be filed under seal upon the Court granting this Motion.

This case involves the physical and sexual abuse of Plaintiff Jane Doe, by Defendant A. Plaintiff alleges that Defendants A-D are liable for damages arising out of that abuse.

It is necessary in the interests of justice that Plaintiff's identity and the identities of the members of Plaintiff's family be withheld from the public record and that this action proceed with Plaintiff identified only by pseudonym. The

public identification of Plaintiff as a victim of this abuse will cause further psychological harm to Plaintiff. It is not necessary or in the interests of justice to identify the Defendants by pseudonyms for the reasons set forth in Plaintiff's Brief in Support of this Application.

The Court should also prohibit each Defendant from disclosing Plaintiff's identity and order that anything filed with the Court that identifies Plaintiff or any member of Plaintiff's family be filed under seal.

The Court should temporarily enter an order granting relief to Plaintiff concerning Plaintiff's identity and the identities of members of Plaintiff's family until such time as the Defendants are provided an opportunity to be heard. After such opportunity, the order should be made permanent. The Court should also set this matter for hearing to determine whether this case should proceed with the Defendants identified only by pseudonym.

The Court should order any party seeking to file protected materials to place such materials in a sealed manila envelope clearly marked with the caption and case number, the word "CONFIDENTIAL", and stating the date the order was entered and the name of the Judge entering the order.

WHEREFORE, Plaintiff requests that the Court enter an order temporarily allowing this action to proceed with Plaintiff identified only by a pseudonym, temporarily prohibiting each Defendant from identifying the Plaintiff or Plaintiff's family members, setting this matter for a hearing to determine whether the temporary orders should become permanent and whether the Defendants should be named in the style of by their true and correct names, and order any Party seeking to file protected materials place such materials in a

sealed manila envelope clearly marked with the caption and case number, the word "CONFIDENTIAL", and stating the date this order was entered and the name of the Judge entering the order.

Respectfully submitted,

CARR & CARR ATTORNEYS

By: 

A. Laurie Koller, OBA #16857
Raymond S. Allred, OBA #11747
4416 S. Harvard Avenue
Tulsa, OK 74135
(918) 747-1000
(918) 747-7284 Fax
Attorneys for Plaintiff